

LABATON SUCHAROW LLP

Thomas A. Dubbs
Louis Gottlieb
Carol C. Villegas
Jeffrey A. Dubbin (SBN 287199)
Aram Boghosian
140 Broadway
New York, New York 10005

*Lead Counsel to Lead Plaintiff and the
Proposed Class*

MICHELSON LAW GROUP

Randy Michelson (SBN 114095)
220 Montgomery Street, Suite 2100
San Francisco, California 94104

*Bankruptcy Counsel to Lead Plaintiff
and the Proposed Class*

LOWENSTEIN SANDLER LLP

Michael S. Etkin (*pro hac vice*)
Andrew Behlmann (*pro hac vice*)
Scott Cargill
Nicole Fulfree
Colleen Maker
One Lowenstein Drive
Roseland, New Jersey 07068

*Bankruptcy Counsel to Lead Plaintiff
and the Proposed Class*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**DECLARATION OF ANDREW D.
BEHLMANN, ESQ. IN SUPPORT OF
SECURITIES LEAD PLAINTIFF'S REPLY IN
FURTHER SUPPORT OF MOTION TO
APPLY BANKRUPTCY RULE 7023 TO
CLASS PROOF OF CLAIM**

1 Andrew D. Behlmann, Esq., hereby declares as follows, pursuant to 28 U.S.C. § 1746:

2
3 1. I am a Partner with the law firm of Lowenstein Sandler LLP, bankruptcy counsel
4 in the chapter 11 cases of the above-captioned debtors in possession (the “**Debtors**”) to Public
5 Employees Retirement Association of New Mexico, the court-appointed lead plaintiff (“**Lead**
6 **Plaintiff**”) in the securities class action styled as *In re PG&E Corporation Securities Litigation*,
7 Case No. 3:18-cv-03509-RS, (the “**Securities Litigation**”), pending in the United States District
8 Court for the Northern District of California. I submit this declaration in support of Lead
9 Plaintiff’s reply (the “**Reply**”) (i) in further support of their *Motion to Apply Bankruptcy Rule*
10 *7023 to the Class Proof of Claim* [ECF No. 5042] (the “**Motion**”) and (ii) in response to the
11 objections (the “**Objections**”) to the Motion filed by the Debtors (the “**Debtors’ Objection**”)
12 [ECF No. 5369] and the Official Committee of Tort Claimants (the “**TCC Objection**”) [ECF
13 No. 5373]. Capitalized terms used but not defined herein have the meanings given thereto in
14 Lead Plaintiff’s Reply, filed contemporaneously herewith.

15 2. Annexed hereto as **Exhibit 1** is a report listing the trading volume of the Debtors’
16 stock between November 15, 2018 and the July 1, 2019 Record Date, retrieved from
17 <https://finance.yahoo.com/quote/PCG/key-statistics?p=PCG>.

18 3. Annexed hereto as **Exhibit 2** is a true and correct copy of Extension Motion filed
19 by the Debtors on January 16, 2020.

20 4. Annexed hereto as **Exhibit 3** is a true and correct copy of Heffler Claims Group’s
21 marketing materials, *Securities Class Action Claims Administration* website as of January 21,
22 2020, retrieved from: <https://www.hefflerclaims.com/securities-settlement-administration/>.

23 5. Annexed hereto as **Exhibit 4** is a true and correct copy of the Declaration of
24 Michael T. Bancroft, CPA Regarding Dissemination of Notice to the Class, *In re KLA-Tencor*
25 *Corp. Securities Litigation*, (N.D. Cal. Aug. 29, 2008), ECF No. 217-1.

26 6. Annexed hereto as **Exhibit 5** is a Bloomberg HDS report schedule listing major
27 holders of PG&E Corporation Common Stock as of January 16, 2020.
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1 7. Annexed hereto as **Exhibit 6** is a true and correct copy of Securities Lead
2 Plaintiff's Memorandum of Points and Authorities in Opposition to Debtors' Motion for
3 Preliminary Injunction as to *In re PG&E Corp. Securities Litig.*, filed in Adv. Pro. No. 19-03039
4 (DM), ECF No. 12 on July 18, 2019.

5
6 I declare under penalty of perjury that the foregoing statements made by me are true and
7 correct to the best of my knowledge, information, and belief, and I understand that I am subject
8 to punishment if any of the foregoing statements made by me are willfully false.
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11 Dated: January 22, 2020

/s/ Andrew D. Behlmann

12 Andrew D. Behlmann, Esq.
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